

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

IN RE: : Chapter 13

Allen Baxter, III : Case No. 19-16493-AMC
Debtor(s)

OBJECTION TO CERTIFICATE OF DEFAULT OF MIDFIRST BANK
AND CERTIFICATE OF SERVICE

Debtor, by his counsel, objects to the Certificate of Default and requests the Court not enter a relief order and to please hold a hearing due to the following:

1. Debtor has already sold this property and this certification is improper.

WHEREFORE, Debtor respectfully requests this Court not enter a relief Order on this matter.

/s/David M. Offen
David M. Offen
Attorney for Debtor
601 Walnut Street, Suite 160
Philadelphia, Pa. 19106
215-625-9600
info@offenlaw.com

A copy of this Objection is being served on DENISE ELIZABETH CARLON, Esquire and the Chapter 13 Trustee by CM/EMC on January 20, 2025.

/s/ David M. Offen
David M. Offen
Attorney for Debtor